

December 15, 2014

Cal Joyner

Regional Forester

333 Broadway SE

Albuquerque, NM 87102

Emailed to: objection-southwester-regional-office@fs.fed.us

RE: Authorization of Helicopter Landings in Wilderness Environmental Analysis

Pursuant to 36 CFR 218 regulations, this is an objection to the Tonto National Forest Finding of No Significant Impact and Environmental Assessment Authorization of Helicopter Landings by Arizona Game and Fish Department within Designated Wilderness Areas.

My name is Roger E. McManus; I reside at 300 N. Indian House Road in Tucson, Arizona 85711. My telephone number is 202 285 6989. I am writing to object to a number of assertions and conclusions relating to the process identified above for the use of mechanized vehicles to transport bighorn sheep, a non-threatened game species, from designated Wilderness Areas in the Tonto National Forest. I previously filed comments on the draft EA on September 2, 2014, which I know were received by the Service.

The EA process conducted by the Service regarding this proposal is inadequate for a large number of reasons. Generally I am disappointed that the Service fundamentally has chosen not to respond substantively to the many significant comments that were submitted on this issue. The EA process administered by the Service essentially is a tautological exercise to promote the proposal to manipulate wildlife populations in designated Wilderness for which the Forest Service is responsible. I know a number of other objectors who have expressed serious concerns that the Service has been unresponsive to significant issues relating to this proposal. As noted in my previous comments, this proposal

warrants a full Environmental Impact Statement process. The substantive and policy impacts of what is being proposed are highly significant and not in compliance with the Wilderness Act. Our democracy depends on a responsive Executive Branch.

The Service has not demonstrated through the MRDG process that this action is necessary or warranted for the stewardship of the designated Wilderness Areas in the Tonto National Forest. Indeed, as demonstrated by recent actions last month by the Arizona Game and Fish Department, transport of sheep from Wilderness in the Tonto National Forest was not “necessary” to fulfill their management plan to increase the bighorn sheep population in the Catalina Mountains. While the EA process takes pains to demonstrate the desirability of using motorized transport it fails to make the case that a choice to do so meets the guidance of the MRDG: “Forest Service policy does not allow managers to base a decision to approve a generally prohibited use solely on a rationale that the method or tool is quicker, cheaper and easier.” Perhaps more importantly, there is essentially no benefit to the bighorn sheep populations in these Wilderness Areas or to the designated Wilderness Areas achieved by reducing the sheep populations through motorized transport for increasing populations elsewhere.

The scope of activities possibly conducted under the EA is so broad over such a lengthy time period that objective oversight and control is highly questionable. I raised this problem in my earlier comments, and my concerns and those of others who identified this problem are not eased by the final EA or the FONSI. Based on the final EA and the FONSI, there appears to be no prospect that the Service will seriously oversee ten years and hundreds of helicopter flights, nor resist erosion of Wilderness values for which it is responsible in the Tonto National Forest.

As I politely noted in my previous comments, the Service needs to prepare a proper EIS regarding the proposed actions in Wilderness. This need has been identified by others in their comments on the EA. The need for using motorized transport as proposed has to be examined in the context of the established recovery of this species and the appropriateness of active management of wildlife in Wilderness including restoration and enhancement of species in designated wilderness that are doing just fine elsewhere and could well reestablish themselves in Wilderness if the habitat is suitable. That this management regime

that the Service is promoting actively involves reduction of predator population further calls into question whether the regime is appropriate for Wilderness stewardship by the Service.

The EA significantly trammels the “untrammeled” standard for Wilderness as prescribed by national law. I am asking the Forest Service to withdraw the FONSI and the draft EA. If the Service proposes to pursue the proposal then a full Environmental Impact Statement will be required.

Finally, I want to emphasize what this objection is not about and what it is about. It is not about humane/hunting concerns. It is not about the politics between State and Federal wildlife management.

What it is about is the Forest Service’s responsibilities and authorities to protect wilderness as established in our nation’s Wilderness Act, and upheld by the associated litigation history. Wilderness in our country are not national forest lands, multiple use BLM lands, or even Parks or Monuments. Designated wilderness areas are the highest level of protection in our national public lands systems. They are where nature is “untrammeled” and left to nature’s direction. They are our window into what nature would be without our direction. While we may benefit from our presence in these areas we are directed to leave nature be in these places.

For the designated Wilderness Areas in the Tonto National Forest, the Forest Service is the chief steward for protecting these national treasures. Please do so.

Respectfully,

Roger McManus

